In the matter of:)
) ISCR Case No. 26-00047
)
Applicant for Security Clearance)

Appearances

For Government: Brian L. Farrell, Esq., Department Counsel
For Applicant: *Pro se*

06/30/2026

Decision

FOREMAN, LeRoy F., Administrative Judge:

Applicant did not mitigate the security concerns under Guideline F (Financial Considerations), Guideline H (Drug Involvement and Substance Misuse), and Guideline E (Personal Conduct). His application for eligibility for access to classified information and assignment to duties designated as national security sensitive is denied.

Statement of the Case

Applicant submitted a Questionnaire for National Security Positions (SCA) on February 14, 2025. On February 10, 2026, the Defense Counterintelligence and Security Agency (DCSA) sent him a Statement of Reasons (SOR) alleging security concerns under Guidelines F and H. Applicant answered the SOR on March 11, 2026, and requested a decision on the written record in lieu of a hearing. Department Counsel submitted the Government's written case on March 25, 2026. In its file of relevant material (FORM), the Government amended the SOR to add a single allegation, subparagraph 3.a., under Guideline E.

A complete copy of the file of relevant material (FORM) was sent to Applicant, who was given an opportunity to file objections and submit material to refute, extenuate, or mitigate the Government's evidence, as well as to admit or deny the new allegation. He received the FORM on March 27, 2026. He did not provide a written response, nor did he address the added allegation, but he did submit four documents relating to the Guideline F allegations.

The case was assigned to me on May 18, 2026, and I issued my decision on June 8, 2026. Subsequently, it was discovered that the four documents Applicant submitted in response to Government's FORM had not been included in the case file. Upon discovering these material documents had not been originally included in the case file, I rescinded my decision on June 17, 2026, to consider the complete record.

On June 22, 2026, Applicant made a request to submit additional documentation. I considered this a motion to reopen the record, which I granted. On June 26, 2026, he submitted three additional documents that related to his 2022 federal taxes, his 2025 state taxes, and a consumer debt. He also resubmitted three previously submitted documents.

The Government's FORM consists of the pleadings in the case (Government Exhibit (GE) 1), Applicant's answer to the original SOR, and the documents in support of the allegations in the original and amended SOR (GE 2 through 6). GE 2 through 6 are admitted into evidence, without objection.

Applicant did not answer the amended SOR. I have treated his failure to respond to the additional allegation as a denial. Applicant's submissions all relate to the Guideline F allegations. I marked his initial submissions as Applicant's Exhibits (AE) A through D. His later submissions included three new documents, which I marked as AE E through G. He resubmitted AE A, the first page of AE B, and AE C. AE A through G are admitted into evidence, without objection.

Findings of Fact

The SOR alleges under Guideline F that Applicant failed to file his federal and state income tax returns, and that he has delinquent federal tax debt as well as delinquent consumer debt. (SOR ¶¶ 1.a-1.e) Specifically, he failed to timely file his federal income tax returns for tax years 2021 through 2023 (SOR ¶ 1.a) and state tax returns for tax years 2021 through 2024 (SOR ¶ 1.b). He is indebted to the federal government for delinquent taxes totaling approximately $143 for tax year 2024 (SOR ¶ 1.c) and $509 for tax year 2020 (SOR ¶ 1.d), and has a consumer account that has been placed for collection in the approximate amount of $2,047 (SOR ¶ 1.e) He admitted all the allegations under Guideline F.

The SOR alleges under Guideline H that Applicant used marijuana with varying frequency from about 2009 to about October 2023 (SOR ¶ 2.a), and that he was terminated from employment in October 2023 for testing positive for marijuana on a drug screening (SOR ¶ 2.b). He admitted all the allegations under Guideline H.

The Government's FORM amends the SOR and alleges under Guideline E that Applicant falsified material facts on his February 14, 2025 SCA when in response to "Section 23 –Illegal Use of Drugs or Drug Activity" he only disclosed a one-time marijuana use in 2023, wherein truth, he frequently used marijuana from 2009 to about October 2023, as he admitted to in SOR ¶ 2.a (SOR ¶ 3.a). Applicant did not provide a written response to Government's FORM. His silence is deemed a denial of the sole allegation under Guideline E.

Applicant is unmarried, 34 years old, with no children, and no history of prior military service. He sporadically attended community college between 2013 and 2024 and received no degree. He has been employed by his government contractor sponsor since February 2025. (GE 3)

In October 2023, after only five months of employment, he was terminated for failing a drug test. He reports he was going through a rough patch and made a poor decision at a party when he "took one hit" of cannabis he was offered. (GE 3 at 18-19; GE 4 at 9-10) In his SCA, he discloses a one-time marijuana use in September 2023, adding "I took a hit of marijuana at a party, but outside of that I do not participate in the use of drugs." (GE 3 at 35; GE 4 at 9-10) He was also fired from another employment in February 2023, for failure to meet standards after being placed on a performance improvement plan, falsifying documentation, and abuse of illegal drugs. He admits he was fired but disagrees with the reasons provided by his former employer whom he describes as "unprofessional" and insists he "never falsified documentation" and "never abused illegal drugs." (GE 4 at 5-6, 17-18) Applicant's February 2023 employment termination was not alleged in the SOR. As a result, I will only consider this information under matters of extenuation and mitigation. For the span of a little over a year, between his 2023 terminations to his current position, he has changed employment approximately five times, stating that on two occasions he left for new employment, on another two occasions he left because his contract ended after one or two months of work, and once because of attendance issues he was having. (GE 3 at 11-20)

In Applicant's response to government interrogatories in January 2026, he verified the accuracy of the summary of his personal subject interview, wherein he confirmed his SCA responses that in the past seven years he has only used marijuana once in September 2023, when he took "one hit" of cannabis he was offered at a party. He was randomly drug tested at his employment a week later, tested positive for marijuana, and was terminated. (GE 4 at 9-10; GE 3 at 19) Later in the same interrogatory response, he disclosed a more extensive marijuana use history, admitting that he first used marijuana in approximately 2009 and that since then he used marijuana "once a day" until the date of his last use in 2023. He declared that he had no future intent for continued use. (GE 4 at 5)

Applicant disclosed a few delinquent consumer credit debts and tax filing failures in his SCA, to include failure to file his 2022 and 2023 tax returns. (GE 3 at 37-43) As of December 2025, Applicant owed the federal government approximately $509 for delinquent taxes for tax year 2020, had not filed a tax return for tax year 2021 through 2023, and owed approximately $143 for delinquent taxes for tax year 2024. (GE 5 at 7-12) He states his failure to file was due to COVID-19, not working during that time, and moving to a different state. In his answer to the SOR, he asserted that he mailed in his federal income tax returns for tax year 2021 through 2023 in January 2026, and that he paid his 2020 tax debt in December 2025 and his 2024 tax debt in January 2026, but he provided no documentation in support. (GE 2) He filed his tax year 2024 tax returns timely but provided no updated information about his state tax issues. (GE 5 at 4-5)

AE A through D reflect the following regarding Applicant's federal and state income tax return filings and taxes. His federal income tax returns for tax year 2023 were received and corrected by the IRS in or about April 2026, and he owes a tax debt of approximately $1593. (AE A-B) The due date for his tax year 2022 income tax returns has passed and they have not yet been processed by the IRS. The same document lists tax year 2021, but does not clearly reflect the current status of that year's income tax returns. (AE B) On December 8, 2025, he made an approximate $507 payment towards his tax year 2020 taxes, and on December 29, 2025, he made an approximate $143 payment towards his tax year 2024 taxes. (AE B) On April 22, 2026, he made an approximate $200 payment towards his tax year 2023 taxes. (AE C) He filed his state income tax returns for tax year 2024 in about April 2026 and owed approximately $92. (AE D) In about April 2026, he filed his federal and state income tax returns for tax year 2025 and had a balance due of approximately $1,612 for his federal income tax, and $470 for his state income tax. (AE D) He made an approximate $430 payment on June 25, 2026, towards his state tax debt for tax year 2025. (AE F) The IRS received and corrected his tax year 2022 income tax returns on or about May 18, 2026, and his refund of $330 was applied to his tax year 2023 outstanding taxes. (AE E)

Applicant's consumer account that was placed for collection in about May 2022 for approximately $2,047 (SOR ¶ 1.e) was for jewelry he had purchased and was unable to keep up with payments due to financial constraints and moving. (GE 6) At the time he completed his SCA, he had been summoned to court regarding this bad debt and attempted to make a payment plan but was unable to do so. (GE 3 at 39-40) In his answer to the SOR, he stated he had negotiated a payment plan with the creditor and had one payment left, but he provided no documentation in support of his alleged good-faith debt resolution. (GE 2) He later submitted documentation reflecting that as of May 1, 2026, the account had been paid in full. (AE G)

Applicant neither admitted nor denied the falsification allegation detailed in SOR ¶ 3.a. In his SCA, he disclosed only a singular incident of marijuana use shortly before his positive drug test result and termination from employment in October 2023. He added this closing comment in his SCA, "This was a very long vetting process. I put in all the information to the best of my ability, in no way shape or form am I trying to be dishonest in my answers. I am answering to the best of my ability." (GE 3 at 45)

During Applicant's personal subject interview in April 2025, he was given the opportunity to correct any omissions or errors he may have made on his SCA. However, he confirmed his drug involvement responses of a one-time marijuana use in September 2023. The first time he disclosed the true extent of his marijuana use was in his January 2026 response to Government interrogatories, where he disclosed "once a day" marijuana use from approximately 2009 to 2023. He admitted these dates of marijuana use with varying frequency in his March 2026 answer to the SOR.

Policies

This case is adjudicated under Executive Order 10865, *Safeguarding Classified Information within Industry* (February 20, 1960), as amended; Department of Defense (DOD) Directive 5220.6, *Defense Industrial Personnel Security Clearance Review Program* (January 2, 1992), as amended (Directive); and the adjudicative guidelines (AG) implemented by the DOD on June 8, 2017.

"[N]o one has a 'right' to a security clearance." *Department of the Navy v. Egan*, 484 U.S. 518, 528 (1988). As Commander in Chief, the President has the authority to "control access to information bearing on national security and to determine whether an individual is sufficiently trustworthy to have access to such information." *Id.* at 527. The President has authorized the Secretary of War or his designee to grant applicants eligibility for access to classified information "only upon a finding that it is clearly consistent with the national interest to do so." Exec. Or. 10865 § 2.

Eligibility for a security clearance is predicated upon the applicant meeting the criteria contained in the adjudicative guidelines. These guidelines are not inflexible rules of law. Instead, recognizing the complexities of human behavior, an administrative judge applies these guidelines in conjunction with an evaluation of the whole person. An administrative judge's overarching adjudicative goal is a fair, impartial, and commonsense decision. An administrative judge must consider all available and reliable information about the person, past and present, favorable and unfavorable.

The Government reposes a high degree of trust and confidence in persons with access to classified information. This relationship transcends normal duty hours and endures throughout off-duty hours. Decisions include, by necessity, consideration of the possible risk that the applicant may deliberately or inadvertently fail to safeguard classified information. Such decisions entail a certain degree of legally permissible extrapolation about potential, rather than actual, risk of compromise of classified information.

Clearance decisions must be made "in terms of the national interest and shall in no sense be a determination as to the loyalty of the applicant concerned." Exec. Or. 10865 § 7. Thus, a decision to deny a security clearance is merely an indication the applicant has not met the strict guidelines the President and the Secretary of War have established for issuing a clearance.

Initially, the Government must establish, by substantial evidence, conditions in the personal or professional history of the applicant that may disqualify the applicant from being eligible for access to classified information. The Government has the burden of establishing controverted facts alleged in the SOR. *See Egan*, 484 U.S. at 531. "Substantial evidence" is "more than a scintilla but less than a preponderance." *See v. Washington Metro. Area Transit Auth.*, 36 F.3d 375, 380 (4th Cir. 1994). The guidelines presume a nexus or rational connection between proven conduct under any of the criteria listed therein and an applicant's security suitability. *See* ISCR Case No. 15-01253 at 3 (App. Bd. Apr. 20, 2016).

Once the Government establishes a disqualifying condition by substantial evidence, the burden shifts to the applicant to rebut, explain, extenuate, or mitigate the facts. Directive ¶ E3.1.15. An applicant has the burden of proving a mitigating condition, and the burden of disproving it never shifts to the Government. *See* ISCR Case No. 02-31154 at 5 (App. Bd. Sep. 22, 2005).

An applicant "has the ultimate burden of demonstrating that it is clearly consistent with the national interest to grant or continue his security clearance." ISCR Case No. 01-20700 at 3 (App. Bd. Dec. 19, 2002). "[S]ecurity clearance determinations should err, if they must, on the side of denials." *Egan*, 484 U.S. at 531.

Analysis

Guideline F, Financial Considerations

The concern under this guideline is set out in AG ¶ 18:

> Failure to live within one's means, satisfy debts, and meet financial obligations may indicate poor self-control, lack of judgment, or unwillingness to abide by rules and regulations, all of which can raise questions about an individual's reliability, trustworthiness, and ability to protect classified or sensitive information. Financial distress can also be caused or exacerbated by, and thus can be a possible indicator of, other issues of personnel security concern such as excessive gambling, mental health conditions, substance misuse, or alcohol abuse or dependence. An individual who is financially overextended is at greater risk of having to engage in illegal or otherwise questionable acts to generate funds.

Applicant's admissions and the evidence in the FORM establish the following disqualifying conditions under this guideline:

AG ¶ 19(a): inability to satisfy debts;

AG ¶ 19(c): a history of not meeting financial obligations; and

AG ¶ 19(f): failure to file or fraudulently filing annual Federal, state, or local income tax returns or failure to pay annual Federal, state, or local income tax as required.

The following mitigating conditions are potentially applicable:

AG ¶ 20(a): the behavior happened so long ago, was so infrequent, or occurred under such circumstances that it is unlikely to recur and does not cast doubt on the individual's current reliability, trustworthiness, or good judgment;

AG ¶ 20(b): the conditions that resulted in the financial problem were largely beyond the person's control (e.g., loss of employment, a business downturn, unexpected medical emergency, a death, divorce or separation, clear victimization by predatory lending practices, or identity theft), and the individual acted responsibly under the circumstances;

AG ¶ 20(c): the individual has received or is receiving financial counseling for the problem from a legitimate and credible source, such as a non-profit credit counseling service, and there are clear indications that the problem is being resolved or is under control; and

AG ¶ 20(d): the individual initiated and is adhering to a good-faith effort to repay overdue creditors or otherwise resolve debts; and

AG ¶ 20(g): the individual has made arrangements with the appropriate tax authority to file or pay the amount owed and is in compliance with those arrangements.

AG ¶ 20(d) applies to SOR ¶ 1.e. AG ¶¶ 20(d) and 20(g) apply to SOR ¶¶ 1.c and 1.d. AG ¶ 20(g) applies to Applicant's late filing of his federal income tax returns for tax years 2022 and 2023 (included in SOR ¶ 1.a) and his state income tax returns for tax year 2024 (included in SOR ¶ 1.b). The record is void of documentation to support application of this mitigating condition to the remaining tax years alleged in SOR ¶¶ 1.a and 1.b.

None of the mitigating conditions apply to the remaining allegations under Guideline F. AG ¶ 20(a) is not established because despite Applicant's assertion that the debt was accrued because of COVID-19 and financial constraints, he failed to establish a nexus of how these circumstances impacted his ability to file his taxes or pay his creditors.[1] There is also little evidence to show that his financial condition has improved and no longer casts doubt on his current reliability, trustworthiness, or good judgment. AG ¶¶ 20(b) and 20(c) are not established, because there is no evidence of responsible action he took at the time the debts were accrued or proof of financial counseling and no

[1] *See* ADP Case No. 16-03595 (App. Bd. Aug. 27, 2018).

clear indications that the problem is being resolved or is under control. AG ¶¶ 20(d) and 20(g) are not established, because he did not provide documentation to support that he filed his past-due tax returns for tax year 2021 (federal and state), 2022 (state), and 2023 (state). It is reasonable for a judge to expect applicants to present documentation about the resolution of specific debts.[2]

Despite Applicant's claims and assertions, the record evidence does not support finding that he is now financially stable and will responsibly address his debt. Although unalleged, there is evidence that his 2025 federal tax debt remains outstanding. Furthermore, several of his acts to address his financial issues and late tax filings post-date the SOR, and some even after submission of Government's FORM. Timing of an applicant's actions impacts upon the degree to which the mitigating factors apply.[3] An applicant who begins to resolve his or her financial problems only after being placed on notice that his or her security clearance is in jeopardy may be lacking in the judgment and self-discipline to follow rules and regulations over time or when there is no immediate threat to his or her own interests.[4] Even if a debt is resolved, a Judge may still consider the circumstances underlying the debt as well as any previous actions or lapses to resolve the debt for what they reveal about security clearance worthiness.[5] Applicant has not yet established a new track record of financial responsibility. Given the extent and history of his financial instability and tax filing failures, his recent actions are insufficient to mitigate the concerns.

Guideline H, Drug Involvement and Substance Misuse

The concern under this guideline is set out in AG ¶ 24:

> The illegal use of controlled substances, to include the misuse of prescription and non-prescription drugs, and the use of other substances that cause physical or mental impairment or are used in a manner inconsistent with their intended purpose can raise questions about an individual's reliability and trustworthiness, both because such behavior may lead to physical or psychological impairment and because it raises questions about a person's ability or willingness to comply with laws, rules, and regulations. *Controlled substance* means any "controlled substance" as defined in 21 U.S.C. 802. *Substance misuse* is the generic term adopted in this guideline to describe any of the behaviors listed above.

---

[2] ISCR Case No. 19-03757 at 3 (App. Bd. Aug. 18, 2021; ISCR Case No. 17-00729 at 3 (App. Bd. Apr. 3, 2019).

[3] ISCR Case No. 08-06058 at 5 (App. Bd. Sep. 21, 2009); *see* ISCR Case No. 17-04110 at 3 (App. Bd. Sep. 26, 2019)

[4] ISCR Case No. 24-00008 at 2 (App. Bd. Mar. 13, 2025); ISCR Case No. 20-02971 at 4 (App. Bd. Jun. 15, 2023); ISCR Case No. 15-03208 at 5 (App. Bd. Mar. 7, 2017); ISCR Case No. 18-02155 at 3 (App. Bd. Oct. 19, 2021); ADP Case No. 17-00263

[5] ISCR Case No. 21-00261 at 3 (App. Bd. June 6, 2022).

Applicant's admissions and the evidence in the FORM establish the following disqualifying conditions under this guideline:

AG ¶ 25(a): any substance misuse (see above definition);

AG ¶ 25(b) testing positive for an illegal drug; and

AG ¶ 25(c): illegal possession of a controlled substance, including cultivation, processing, manufacture, purchase, sale, or distribution; or possession of drug paraphernalia.

The following mitigating conditions are potentially applicable:

AG ¶ 26(a): the behavior happened so long ago, was so infrequent, or happened under such circumstances that it is unlikely to recur or does not cast doubt on the individual's current reliability, trustworthiness, or good judgment;

AG ¶ 26(b): the individual acknowledges his or her drug involvement and substance misuse, provides evidence of actions taken to overcome this problem, and has established a pattern of abstinence, including, but not limited to:

(1) disassociation from drug-using associates and contacts;

(2) changing or avoiding the environment where drugs were used; and

(3) providing a signed statement of intent to abstain from all drug involvement and substance misuse, acknowledging that any future involvement or misuse is grounds for revocation of national security eligibility; and

None of the mitigating conditions apply. AG ¶¶ 26(a) and 26(b) do not apply because Applicant's marijuana use was regular and frequent over an approximate 14-year period, and given his length and regularity of use, his assertion that he has ceased and has no intent on future use is insufficient to mitigate his use. He did not fully disclose the length and extent of his marijuana use at his first opportunity, which in and of itself raises security concerns about his reliability, trustworthiness, and good judgment. He provided no evidence to support his claim that he has ceased his marijuana use. There is no evidence of changes in his behavior or environment. He has not signed a statement of intent to abstain from all drug involvement and substance misuse, acknowledging that any future involvement or misuse is grounds for revocation of national security eligibility.

Guideline E, Personal Conduct

The security concern under this guideline is set out in AG ¶ 15: "Conduct involving questionable judgment, lack of candor, dishonesty, or unwillingness to comply with rules and regulations can raise questions about an individual's reliability, trustworthiness, and ability to protect classified or sensitive information. . . ."

The evidence in the FORM establishes the following disqualifying conditions under this guideline:

> AG ¶ 16(a): deliberate omission, concealment, or falsification of relevant facts from any personnel security questionnaire, personal history statement, or similar form used to conduct investigations, determine employment qualifications, award benefits or status, determine national security eligibility or trustworthiness, or award fiduciary responsibilities; and
>
> AG ¶ 16(b): deliberately providing false or misleading information; or concealing or omitting information, concerning relevant facts to an employer, investigator, security official, competent medical or mental health professional involved in making a recommendation relevant to a national security eligibility determination, or other official government representative.

Applicant intentionally did not disclose the full extent of his marijuana use in his SCA. The question is clear on its face and asked for all use in the past seven-year period. His specificity in his response, in both the employment termination portion where he disclosed his positive drug test, and the drug involvement disclosure, where he again re-iterated that he only took "one hit" of marijuana on one night, demonstrates his intent to provide very specific information and to make it abundantly clear that he only used marijuana once during the time-period in question. His closing statement in his SCA "I put in all the information to the best of my ability, in no way shape or form am I trying to be dishonest in my answers" also rings hollow, when he was given an opportunity by the investigator during his personal subject interview to correct any omissions or errors in his SCA, and he confirmed his responses about his previous drug use. The answers and information he provided in his SCA and during his interview are in stark contrast to the period and frequency of marijuana use he provided in response to Government interrogatories. I find that his answer in his SCA was not an oversight or error, but rather an intentional act of providing misleading information and deliberate omission of relevant facts.

The following mitigating conditions are potentially applicable:

> AG ¶ 17(a): the individual made prompt, good-faith efforts to correct the omission, concealment, or falsification before being confronted with the facts; and
>
> AG ¶ 17(c): the offense is so minor, or so much time has passed, or the behavior is so infrequent, or it happened under such unique circumstances

> that it is unlikely to recur and does not cast doubt on the individual's reliability, trustworthiness, or good judgment.

None of the mitigating conditions apply. AG ¶¶ 17(a) and 17(c) do not apply because Applicant did not make prompt, good-faith efforts to correct his omission, concealment, or falsification at his first opportunity during his subject interview. His later admissions in response to government drug interrogatories carry little mitigative value. Moreover, the offense is recent, not minor, and continues to cast doubt on his reliability, trustworthiness, and good judgment.

Whole-Person Concept

Under AG ¶ 2(c), the ultimate determination of whether to grant eligibility for a security clearance must be an overall commonsense judgment based upon careful consideration of the guidelines and the whole-person concept. In applying the whole-person concept, an administrative judge must evaluate an applicant's eligibility for a security clearance by considering the totality of the applicant's conduct and all relevant circumstances. An administrative judge should consider the nine adjudicative process factors listed at AG ¶ 2(d):

> (1) the nature, extent, and seriousness of the conduct; (2) the circumstances surrounding the conduct, to include knowledgeable participation; (3) the frequency and recency of the conduct; (4) the individual's age and maturity at the time of the conduct; (5) the extent to which participation is voluntary; (6) the presence or absence of rehabilitation and other permanent behavioral changes; (7) the motivation for the conduct; (8) the potential for pressure, coercion, exploitation, or duress; and (9) the likelihood of continuation or recurrence.

I have incorporated my comments under Guidelines F, H, and E in my whole-person analysis and applied the adjudicative factors in AG ¶ 2(d). Because Applicant requested a determination on the record without a hearing, I had no opportunity to evaluate his credibility and sincerity based on demeanor. *See* ISCR Case No. 01-12350 at 3-4 (App. Bd. Jul. 23, 2003). After weighing the disqualifying and mitigating conditions under Guidelines F, H, and E and evaluating all the evidence in the context of the whole person, I conclude Applicant has not mitigated the security concerns raised under Guideline F (Financial Considerations), Guideline H (Drug Involvement and Substance Misuse), and Guideline E (Personal Conduct).

Formal Findings

I make the following formal findings for or against Applicant on the allegations set forth in the SOR, as required by ¶ E3.1.25 of Enclosure 3 of the Directive:

Paragraph 1, Guideline F: AGAINST APPLICANT

Subparagraphs 1.a-1.b:	Against Applicant
Subparagraphs 1.c-1.e:	For Applicant
Paragraph 2, Guideline H:	AGAINST APPLICANT
Subparagraphs 2.a-2.b:	Against Applicant
Paragraph 3, Guideline E:	AGAINST APPLICANT
Subparagraph 3.a:	Against Applicant

Conclusion

I conclude that it is not clearly consistent with the national security interests of the United States to grant Applicant eligibility for access to classified information. Clearance is denied.

LeRoy F. Foreman
Administrative Judge